

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES INVESTOR PROTECTION
CORPORATION,

Plaintiff-Applicant,

v.

BERNARD L. MADOFF INVESTMENT
SECURITIES LLC,

Defendant.

Adv. Pro. No. 08-01789 (CGM)

SIPA Liquidation

(Substantively Consolidated)

In re:

BERNARD L. MADOFF,

Debtor.

IRVING H. PICARD, Trustee for the
Liquidation of Bernard L. Madoff Investment
Securities LLC, and Bernard L. Madoff,

Plaintiff,

v.

CRÉDIT AGRICOLE (SUISSE) S.A., and
CRÉDIT AGRICOLE S.A., a/k/a BANQUE
DU CRÉDIT AGRICOLE,

Defendants.

Adv. Pro. No. 12-1022 (CGM)

AMENDED STIPULATION AND ORDER

Irving H. Picard (the “Trustee”), as trustee for the substantively consolidated liquidation of the business of Bernard L. Madoff Investment Securities LLC under the Securities Investor Protection Act, 15 U.S.C. §§ 78aaa–*III*, and the estate of Bernard L. Madoff, individually, and defendant Crédit Agricole (Suisse) S.A. (“C.A. Suisse” or the “Defendant”), and collectively with

the Trustee, the “Parties,” each a “Party”), by and through their respective, undersigned counsel, hereby stipulate and agree as follows:

WHEREAS, on March 29, 2022, the Court entered a scheduling order for Defendant to answer, move, or otherwise respond to the Complaint, Dkt. No. 113;

WHEREAS, on May 12, 2022, the Court entered a scheduling order for Defendant to answer, move, or otherwise respond to the Complaint, Dkt. No. 114;

WHEREAS, Defendant has requested a short extension of the deadlines in the scheduling order to ensure that the Parties have fully addressed the arguments;

WHEREAS, the Trustee consents to the Defendant’s request provided that he is afforded a reciprocal extension to file his opposition brief;

WHEREAS, the Parties have demonstrated “good cause” for extending the deadlines set forth in the scheduling order;

IT IS HEREBY STIPULATED AND AGREED, that

1. Defendant shall respond to the Complaint by July 18, 2022, by filing a motion to dismiss. The Trustee shall respond to the motion by September 30, 2022, and Defendant shall file its reply October 31, 2022.

2. The Parties shall seek oral argument on the motion to dismiss at the Court’s first available convenience.

3. The above deadlines granted by this stipulation are without prejudice to either Party seeking future extensions of time.

4. This stipulation may be signed by the Parties in any number of counterparts, each of which when so signed shall be an original, but all of which shall together constitute one and

the same instrument. A signed facsimile, photostatic, or electronic copy of this stipulation shall be deemed an original.

Dated: June 15, 2022
New York, New York

**YOUNG CONAWAY STARGATT &
TAYLOR, LLP**

By: /s/ Matthew B. Lunn
1270 Avenue of the Americas
Suite 2210
New York, NY 10020
Telephone: 212.332.8840
Facsimile: (212) 332-8855
Matthew B. Lunn
Email: mlunn@ycst.com
Justin P. Duda
Email: jduda@ycst.com
Roxanne M. Eastes
Email: reastes@ycst.com

*Attorneys for Plaintiff Irving H. Picard,
Trustee for the Liquidation of Bernard L.
Madoff Investment Securities LLC and the
estate of Bernard L. Madoff*

**CLEARY GOTTlieb STEEN &
HAMILTON LLP**

By: /s/ Elizabeth Vicens
One Liberty Plaza
New York, New York 10006
Telephone: 212.225.2000
Facsimile: 212.225.3999
Elizabeth Vicens
Email: evicens@cgsh.com
Rachel Polan
Email: rpolan@cgsh.com

*Attorneys for Defendant Crédit Agricole
(Suisse) S.A.*

**Dated: June 16, 2022
Poughkeepsie, New York**



/s/ Cecelia G. Morris

**Hon. Cecelia G. Morris
U.S. Bankruptcy Judge**